
State: District of Columbia **First Filing Company:** TNUS Insurance Company, ...
TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations
Product Name: Commercial Automobile
Project Name/Number: Commercial Automobile/16-DC-2-CA-29-18

Filing at a Glance

Companies: TNUS Insurance Company
Trans Pacific Insurance Company
Tokio Marine America Insurance Company

Product Name: Commercial Automobile

State: District of Columbia

TOI: 20.0 Commercial Auto

Sub-TOI: 20.0000 Commercial Auto Combinations

Filing Type: Rule

Date Submitted: 11/21/2016

SERFF Tr Num: WESA-130815970

SERFF Status: Submitted to State

State Tr Num:

State Status:

Co Tr Num: 16-DC-2-CA-29-18

Effective Date 01/01/2017

Requested (New):

Effective Date 01/01/2017

Requested (Renewal):

Author(s): Wesley Pohler

Reviewer(s):

Disposition Date:

Disposition Status:

Effective Date (New):

Effective Date (Renewal):

State: District of Columbia **First Filing Company:** TNUS Insurance Company, ...
TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations
Product Name: Commercial Automobile
Project Name/Number: Commercial Automobile/16-DC-2-CA-29-18

General Information

Project Name: Commercial Automobile Status of Filing in Domicile: Pending
Project Number: 16-DC-2-CA-29-18 Domicile Status Comments:
Reference Organization: N/A Reference Number: N/A
Reference Title: N/A Advisory Org. Circular: N/A
Filing Status Changed: 11/21/2016
State Status Changed: Deemer Date:
Created By: Wesley Pohler Submitted By: Wesley Pohler
Corresponding Filing Tracking Number: 16-DC-3-CA-28-18

Filing Description:

Enclosed please find the Companies' Commercial Automobile rule submission. Letters permitting Westmont Associates, Inc. to submit this filing on the Companies' behalf are enclosed.

In this filing, the Companies are introducing the corresponding rules to two new multistate deductible liability endorsements.

The purpose is to offer current and prospective policyholders with optional features that are not available under the ISO deductible liability insurance product. Please refer to the enclosed explanatory memoranda for additional details regarding this filing.

The corresponding forms have been submitted separately.

The Companies are requesting an effective date of January 1, 2017.

Your approval and/or acknowledgement of this submission is respectfully requested, with the earliest permissible effective date. Thank you for your attention to this matter.

Company and Contact

Filing Contact Information

Sherri Penn, Senior Analyst	sherri@westmontlaw.com
1763 Marlton Pike East	856-216-0220 [Phone]
Suite 200	856-216-0303 [FAX]
Cherry Hill, NJ 08003	

State: District of Columbia **First Filing Company:** TNUS Insurance Company, ...
TOI/Sub-TOI: 20.0 Commercial Auto/20.0000 Commercial Auto Combinations
Product Name: Commercial Automobile
Project Name/Number: Commercial Automobile/16-DC-2-CA-29-18

Filing Company Information

(This filing was made by a third party - westmontassociatesinc)

TNUS Insurance Company	CoCode: 32301	State of Domicile: New York
230 Park Avenue	Group Code: 3098	Company Type:
New York, NY 10169	Group Name: Tokio Marine Group	State ID Number:
(212) 297-6600 ext. [Phone]	FEIN Number: 20-0940754	

Trans Pacific Insurance Company	CoCode: 41238	State of Domicile: New York
230 Park Avenue	Group Code: 3098	Company Type:
New York, NY 10169	Group Name: Tokio Marine Group	State ID Number:
(212) 297-6600 ext. [Phone]	FEIN Number: 13-3118700	

Tokio Marine America Insurance Company	CoCode: 10945	State of Domicile: New York
230 Park Avenue	Group Code: 3098	Company Type:
New York, NY 10169	Group Name: Millea Group	State ID Number:
(212) 297-6600 ext. [Phone]	FEIN Number: 13-4032666	

Filing Fees

Fee Required?	No
Retaliatory?	No
Fee Explanation:	

SERFF Tracking #:	WESA-130815970	State Tracking #:		Company Tracking #:	16-DC-2-CA-29-18
<hr/>					
State:	District of Columbia	First Filing Company:	TNUS Insurance Company, ...		
TOI/Sub-TOI:	20.0 Commercial Auto/20.0000 Commercial Auto Combinations				
Product Name:	Commercial Automobile				
Project Name/Number:	Commercial Automobile/16-DC-2-CA-29-18				

Rate Information

Rate data does NOT apply to filing.

State:	District of Columbia	First Filing Company:	TNUS Insurance Company, ...
TOI/Sub-TOI:	20.0 Commercial Auto/20.0000 Commercial Auto Combinations		
Product Name:	Commercial Automobile		
Project Name/Number:	Commercial Automobile/16-DC-2-CA-29-18		

Rate/Rule Schedule

Item No.	Schedule Item Status	Exhibit Name	Rule # or Page #	Rate Action	Previous State Filing Number	Attachments
1		Commercial Automobile Exception Pages	Pages 1-3	New		TM Exceptions to ISO CA Rules_01 2017_AOS.pdf

COMPANY RULE(S)

TMM Additional Rule

CA9 03 025 01 17, DEDUCTIBLE LIABILITY ENDORSEMENT (INCLUDING COSTS AND EXPENSES WITH THE DEDUCTIBLE NOT REDUCING THE LIMITS OF INSURANCE); CA9 03 026 01 17, DEDUCTIBLE LIABILITY ENDORSEMENT (INCLUDING COSTS AND EXPENSES WITH THE DEDUCTIBLE REDUCING THE LIMITS OF INSURANCE – PROPORTIONAL BASIS)

A. Eligibility

The eligibility for an optional deductible is as follows.

A. Deductible Method

For a deductible, a risk may be rated under this rule if at least one of the following applies:

a. Minimum Deductible Amount

The deductible amount is greater than \$100,000.

b. Minimum Amount Of Incurred Losses

The incurred losses, including all allocated loss adjustment expenses (ALAE) must total least \$100,000 for the combination of the current policy period and the three prior policy periods.

c. Use of a Deductible Aggregate Amount

The deductible amount is subject to a deductible aggregate limit.

B. Rating Procedure

The following rating procedure applies to both deductibles unless specifically noted below. The rating procedure follows the common techniques used for larger policyholders.

1. First Dollar Loss Projections

First dollar loss projections are determined as a base line for later calculations reflecting policy terms including limits of insurance but not the large deductibles.

a. Loss Rating

Entails the development of historical incurred loss (and allocated loss adjustment expenses) for the prior policy periods and would consider:

- i. Changes in the level of claim costs
- ii. Development of reported claims
- iii. Losses that are incurred but not yet reported

b. Exposure Rating

Entails the use of bureau loss costs and independently filed rates to estimate expected loss costs.

c. Other Modeling Techniques

These may include loss distributions simulated across various time periods.

d. Final Loss Projection

Results of the models above are reviewed and a final loss is judgmentally selected based on the results of the models with consideration to the specific underlying exposures.

2. Loss (and Allocated Loss Adjustment Expenses) Elimination Amounts

- a.** Expected Loss within the deductible amount should consider terms of the agreement including whether to include allocated loss adjustment expenses (ALAE) and the existence of aggregate deductible or retention amounts.
- b.** Consideration for the losses (& ALAE) eliminated by the deductibles can consider excess loss factors from bureau sources like deductible tables, historical company loss distributions, and other modeling techniques.

Determination of the expected loss (& ALAE) eliminated by the large deductibles is judgmentally selected from the results of the model results above with consideration to the specific underlying exposures.

3. Expense and Profit Amounts

Expense amounts should include all amounts associated with the transfer of risk and appropriately reflect policy terms. These typically include but are not limited to commissions, acquisition expenses, general expenses, premium taxes, state licenses, other state fees assessments & surcharges, facultative reinsurance costs above expected amounts already considered, third party administrator oversight costs, large deductible administration costs, loss control, credit risk, and profit.

Expense amounts can be determined as fixed, variable charges to first dollar loss (and ALAE), or variable charges to loss (and ALAE) net of large deductibles.

4. Final policy premium

The final premium is determined as:

Projected Loss (and ALAE) from Paragraph **B.1**

minus Projected Loss (and ALAE) Eliminated by Large Deductible from Paragraph **B.2.**

Plus Fixed Expense and Profit Amounts

Plus Variable Expense and Profit Amounts to First dollar Loss (and ALAE)

This subtotal is divided by the quantity of

1.00 minus Variable Expense and Profit Charges to loss (and ALAE) net of large deductibles.

Tokio Marine America Insurance Company TNUS Insurance Company Trans Pacific Insurance Company	COMMERCIAL LINES MANUAL DIVISION ONE – COMMERCIAL AUTOMOBILE EXCEPTION PAGES	[State Name]
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C. Endorsements

The following endorsements are available:

1. Deductible Liability

- a. When the deductible amount does not reduce the limits of insurance and the Insured's share of costs and expenses is within the deductible amount, use Form **CA9 03 025, DEDUCTIBLE LIABILITY ENDORSEMENT (INCLUDING COSTS AND EXPENSES WITH THE DEDUCTIBLE NOT REDUCING THE LIMITS OF INSURANCE;**
- b. When the deductible reduces the limits of insurance and the Insured's share of costs and expenses is on a proportional basis, use Form **CA9 03 026, DEDUCTIBLE LIABILITY ENDORSEMENT (INCLUDING COSTS AND EXPENSES WITH THE DEDUCTIBLE REDUCING THE LIMITS OF INSURANCE – PROPORTIONAL BASIS.**

State:	District of Columbia	First Filing Company:	TNUS Insurance Company, ...
TOI/Sub-TOI:	20.0 Commercial Auto/20.0000 Commercial Auto Combinations		
Product Name:	Commercial Automobile		
Project Name/Number:	Commercial Automobile/16-DC-2-CA-29-18		

Supporting Document Schedules

Satisfied - Item:	Consulting Authorization
Comments:	Please refer to the documents attached below.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	Actuarial Certification (P&C)
Bypass Reason:	This requirement does not apply.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	District of Columbia and Countrywide Experience for the Last 5 Years (P&C)
Bypass Reason:	This requirement does not apply.
Attachment(s):	
Item Status:	
Status Date:	

Bypassed - Item:	District of Columbia and Countrywide Loss Ratio Analysis (P&C)
Bypass Reason:	This requirement does not apply.
Attachment(s):	
Item Status:	
Status Date:	

Satisfied - Item:	Cover Letter
Comments:	
Attachment(s):	DC letter - R.pdf
Item Status:	
Status Date:	

Satisfied - Item:	Explanatory Memoranda
Comments:	
Attachment(s):	Rules Explanatory memo.pdf
Item Status:	
Status Date:	

State:	District of Columbia	First Filing Company:	TNUS Insurance Company, ...
TOI/Sub-TOI:	20.0 Commercial Auto/20.0000 Commercial Auto Combinations		
Product Name:	Commercial Automobile		
Project Name/Number:	Commercial Automobile/16-DC-2-CA-29-18		

Satisfied - Item:	Letters of Authorization
Comments:	
Attachment(s):	TMAIC Letter of Authorization.pdf TNUS Letter of Authorization.pdf TPI Letter of Authorization.pdf
Item Status:	
Status Date:	



**WESTMONT
ASSOCIATES, INC.**

November 16, 2016

The Honorable William P. White
Commissioner of Insurance
Department of Insurance, Securities and Banking
810 First Street, NE, Room 701
Washington, DC 20002

**RE: Tokio Marine America Insurance Company - NAIC #3098-10945: FEIN #13-4032666
Trans Pacific Insurance Company – NAIC #: 3098-41238/FEIN #: 13-3118700
TNUS Insurance Company – NAIC #: 3098-32301/FEIN #: 20-0940754
Commercial Automobile
Rule Submission
Company Filing Number: 16-DC-2-CA-29-18
Effective Date: January 1, 2017**

Dear Commissioner White:

Enclosed please find the Companies' Commercial Automobile rule submission. Letters permitting Westmont Associates, Inc. to submit this filing on the Companies' behalf are enclosed.

In this filing, the Companies are introducing the corresponding rules to two new multistate deductible liability endorsements.

The purpose is to offer current and prospective policyholders with optional features that are not available under the ISO deductible liability insurance product. Please refer to the enclosed explanatory memoranda for additional details regarding this filing.

The corresponding forms have been submitted separately.

The Companies are requesting an effective date of January 1, 2017.

Your approval and/or acknowledgement of this submission is respectfully requested, with the earliest permissible effective date. Thank you for your attention to this matter.

Respectfully Submitted,

Sherri Penn

Sherri Penn
Project Manager
sherri@westmontlaw.com

Enclosures

cc: J. Loughran
R. Blackman

COMMERCIAL AUTOMOBILE

Explanatory Memorandum – Rules

Introduction of Multistate Commercial Automobile Deductible Rating Rule

Applicable Line(s) of Business

This filing applies to the following:

- ◆ Commercial Automobile

About This Filing

In this filing, we are introducing:

- ◆ Two multistate deductible liability endorsements; and

These endorsements modify insurance provided under the Commercial Automobile Liability Coverage Form.

APPENDIX A – FORMS INDEX of this Explanatory Memorandum lists the form numbers, edition dates and titles of the proposed endorsements.

Purpose of the Rating Rule

The purpose of the proposed rating rule is to create a rating methodology that produces a premium that more accurately reflects the individual policyholder's own loss experience (rather than merely utilizing a methodology based upon generic industry loss data).

Method Of Formatting

We are not using the common format of ~~striking-through~~ deletions and underlining additions, as all material is new.

Background

We utilize the automobile liability forms portfolio and the Automobile Commercial Lines Manual of the Insurance Services Office, Inc. (ISO).

The portfolio includes the Commercial Automobile Coverage Form.

The portfolio also includes an optional endorsement, Deductible Liability Insurance, to modify the Auto Coverage Form. As a summary of the major features, this endorsement:

- ◆ Applies on a per accident basis as denoted in the Schedule of the endorsement.
- ◆ Applies to either bodily injury only, property damage only or bodily injury and property damage combined, as denoted in the Schedule of the endorsement.

COMMERCIAL AUTOMOBILE

Explanatory Memorandum – Rules

- ◆ Does not apply to certain costs and expenses, such as those included in Supplementary Payments.
- ◆ Does not reduce the policy's limits of insurance

The Automobile Liability Commercial Lines Manual includes Rule 15 (Deductibles). In part, this rule:

- ◆ Establishes a minimum deductible amount (\$250) and a maximum deductible amount (\$100,000).
- ◆ Provides a credit for each of the deductible amounts stated in the aforementioned minimum and maximum range.

In general, small to medium size policyholders (who are not sophisticated insurance buyers) are satisfied with the ISO deductible endorsement, deductible amount range and amount of the deductible credit.

However, large size policyholders (who are sophisticated insurance buyers) are not satisfied with the ISO deductible product because:

- ◆ The deductible endorsement does not offer all of the features desired by those policyholders.
- ◆ The rule does not offer the options, including deductible amounts in excess of \$100,000, desired by these policyholders.
- ◆ The credit factors are fixed and do not adjust with the policyholder's own historical loss experience.

Introduction

Many large size policyholders (who are sophisticated insurance buyers), retain frequent losses rather than purchase insurance to cover those losses.

- ◆ The Duty To Defend

Under the deductible method, the insurance company has the duty to defend the policyholder for losses equal to and below the deductible amount (as well as any part of the loss above the deductible amount).

- ◆ Payment Of Damages

Under the deductible method, the insurance company pays on behalf of the policyholder those loss amounts equal to and below the deductible amount (as well as any part of the loss above the deductible amount).

Explanation of Changes - Rule

In response to the requests of current and prospective large size policyholders (who are sophisticated insurance buyers) and their insurance producers, we are introducing a multistate deductible liability **rating rule**.

Presented below is an explanation by paragraph of the rating rule for both the deductible endorsements.

COMMERCIAL AUTOMOBILE

Explanatory Memorandum – Rules

For details, please refer to **APPENDIX A – RATING RULE** of this Explanatory Memorandum.

♦ **Paragraph a (Eligibility)**

This paragraph establishes the eligibility for a deductible.

In our opinion, the eligibility is actuarially sound and reflects the characteristics of a sophisticated insurance buyer.

♦ **Paragraph B (Rating Procedure)**

This paragraph establishes the rating procedure for deductibles.

The rating procedure follows the common techniques used for larger policyholders.

First Dollar Loss Projections

First dollar loss projections are determined as a base line for later calculations reflecting policy terms including limits of insurance but not the large deductibles.

Loss Rating

Entails the development of historical incurred loss (and allocated loss adjustment expenses) for the prior policy periods and would consider:

- i. Changes in the level of claim costs
- ii. Development of reported claims
- iii. Losses that are incurred but not yet reported

Exposure Rating

Entails the use of bureau loss costs and independently filed rates to estimate expected loss costs.

Other Modeling Techniques

These may include loss distributions simulated across various time periods.

Final Loss Projection

Results of the models above are reviewed and a final loss is judgmentally selected based on the results of the models with consideration to the specific underlying exposures.

Loss (and Allocated Loss Adjustment Expenses) Elimination Amounts

Expected Loss within the deductible or self-insured retention amount should consider terms of the agreement including whether to include allocated loss adjustment expenses (ALAE) and the existence of aggregate deductible or retention amounts.

Consideration for the losses (& ALAE) eliminated by the deductibles can consider excess loss factors from bureau sources like deductible tables, historical company loss distributions, and other modeling techniques.

COMMERCIAL AUTOMOBILE

Explanatory Memorandum – Rules

Determination of the expected loss (& ALAE) eliminated by the large deductibles is judgmentally selected from the results of the model results above with consideration to the specific underlying exposures.

Expense and Profit Amounts

Expense amounts should include all amounts associated with the transfer of risk and appropriately reflect policy terms. These typically include but are not limited to commissions, acquisition expenses, general expenses, premium taxes, state licenses, other state fees assessments & surcharges, facultative reinsurance costs above expected amounts already considered, third party administrator oversight costs, large deductible administration costs, loss control, credit risk, and profit.

Expense amounts can be determined as fixed, variable charges to first dollar loss (and ALAE), or variable charges to loss (and ALAE) net of large deductibles..

Final policy premium

The final premium is determined as:

Projected Loss (and ALAE) from Paragraph B.1

minus Projected Loss (and ALAE) Eliminated by Large Deductible from Paragraph B.2.

Plus Fixed Expense and Profit Amounts

Plus Variable Expense and Profit Amounts to First dollar Loss (and ALAE)

This subtotal is divided by the quantity of

1.00 minus Variable Expense and Profit Charges to loss (and ALAE) net of large deductibles

Related Filing(s)

There is a **forms** filing.

ATTACHMENT(S)

TMM ADDITIONAL RULE:

CA9 03 025 01 17, DEDUCTIBLE LIABILITY ENDORSEMENT (INCLUDING COSTS AND EXPENSES WITH THE DEDUCTIBLE NOT REDUCING THE LIMITS OF INSURANCE); CA9 03 026 01 17, DEDUCTIBLE LIABILITY ENDORSEMENT (INCLUDING COSTS AND EXPENSES WITH THE DEDUCTIBLE REDUCING THE LIMITS OF INSURANCE – PROPORTIONAL BASIS)

A. Eligibility

The eligibility for an optional deductible is as follows.

1. Deductible Method

For a deductible, a risk may be rated under this rule if at least one of the following applies:

COMMERCIAL AUTOMOBILE

Explanatory Memorandum – Rules

a. Minimum Deductible Amount

The deductible amount is greater than \$100,000.

b. Minimum Amount Of Incurred Losses

The incurred losses, including all allocated loss adjustment expenses (ALAE) must total least \$100,000 for the combination of the current policy period and the three prior policy periods.

c. Use of a Deductible Aggregate Amount

The deductible amount is subject to a deductible aggregate limit.

B. Rating Procedure

The following rating procedure applies to both deductibles unless specifically noted below. The rating procedure follows the common techniques used for larger policyholders.

1. First Dollar Loss Projections

First dollar loss projections are determined as a base line for later calculations reflecting policy terms including limits of insurance but not the large deductibles.

a. Loss Rating

Entails the development of historical incurred loss (and allocated loss adjustment expenses) for the prior policy periods and would consider:

- i. Changes in the level of claim costs
- ii. Development of reported claims
- iii. Losses that are incurred but not yet reported

b. Exposure Rating

Entails the use of bureau loss costs and independently filed rates to estimate expected loss costs.

c. Other Modeling Techniques

These may include loss distributions simulated across various time periods.

d. Final Loss Projection

Results of the models above are reviewed and a final loss is judgmentally selected based on the results of the models with consideration to the specific underlying exposures.

2. Loss (and Allocated Loss Adjustment Expenses) Elimination Amounts

- a. Expected Loss within the deductible amount should consider terms of the agreement including whether to include allocated loss adjustment expenses (ALAE) and the existence of aggregate deductible or retention amounts.
- b. Consideration for the losses (& ALAE) eliminated by the deductibles can consider excess loss factors from bureau sources like deductible tables, historical company loss distributions, and other modeling techniques.

COMMERCIAL AUTOMOBILE

Explanatory Memorandum – Rules

Determination of the expected loss (& ALAE) eliminated by the large deductibles is judgmentally selected from the results of the model results above with consideration to the specific underlying exposures.

3. Expense and Profit Amounts

Expense amounts should include all amounts associated with the transfer of risk and appropriately reflect policy terms. These typically include but are not limited to commissions, acquisition expenses, general expenses, premium taxes, state licenses, other state fees assessments & surcharges, facultative reinsurance costs above expected amounts already considered, third party administrator oversight costs, large deductible administration costs, loss control, credit risk, and profit.

Expense amounts can be determined as fixed, variable charges to first dollar loss (and ALAE), or variable charges to loss (and ALAE) net of large deductibles.

4. Final policy premium

The final premium is determined as:

Projected Loss (and ALAE) from Paragraph **B.1**

minus Projected Loss (and ALAE) Eliminated by Large Deductible from Paragraph **B.2**.

Plus Fixed Expense and Profit Amounts

Plus Variable Expense and Profit Amounts to First dollar Loss (and ALAE)

This subtotal is divided by the quantity of

1.00 minus Variable Expense and Profit Charges to loss (and ALAE) net of large deductibles.

C. Endorsements

The following endorsements are available:

1. Deductible Liability

- a. When the deductible amount does not reduce the limits of insurance and the Insured's share of costs and expenses is within the deductible amount, use Form **CA9 03 025, DEDUCTIBLE LIABILITY ENDORSEMENT (INCLUDING COSTS AND EXPENSES WITH THE DEDUCTIBLE NOT REDUCING THE LIMITS OF INSURANCE;**
- b. When the deductible reduces the limits of insurance and the Insured's share of costs and expenses is on a proportional basis, use Form **CA9 03 026, DEDUCTIBLE LIABILITY ENDORSEMENT (INCLUDING COSTS AND EXPENSES WITH THE DEDUCTIBLE REDUCING THE LIMITS OF INSURANCE – PROPORTIONAL BASIS.**



TOKIO MARINE

Tokio Marine Management
& Insurance Companies

February 2, 2016

RE: Tokio Marine America Insurance Company
NAIC # 3098-10945
FEIN#: 13-4032666
Letter of Authorization
Filing of Forms, Rates and Rules

In accordance with the applicable statutes and regulations of your state, Nancy Stepanski, Wesley Pohler, Jennifer Waldron, Sherri Penn and Westmont Associates, Inc. are hereby authorized to file form, rate and rule filings on behalf of the Company.

Sincerely,

Chip Adams
Vice President Corporate Underwriting
P&C Product Management



TOKIO MARINE

Tokio Marine Management
& Insurance Companies

February 2, 2016

RE: TNUS Insurance Company
NAIC # 3098-32301
FEIN#: 20-0940754
Letter of Authorization
Filing of Forms, Rates and Rules

In accordance with the applicable statutes and regulations of your state, Nancy Stepanski, Wesley Pohler, Jennifer Waldron, Sherri Penn and Westmont Associates, Inc. are hereby authorized to file form, rate and rule filings on behalf of the Company.

Sincerely,

Chip Adams
Vice President Corporate Underwriting
P&C Product Management



TOKIO MARINE

Tokio Marine Management
& Insurance Companies

February 2, 2016

RE: Trans Pacific Insurance Company
NAIC # 3098-41238
FEIN#: 13-3118700
Letter of Authorization
Filing of Forms, Rates and Rules

In accordance with the applicable statutes and regulations of your state, Nancy Stepanski, Wesley Pohler, Jennifer Waldron, Sherri Penn and Westmont Associates, Inc. are hereby authorized to file form, rate and rule filings on behalf of the Company.

Sincerely,

Chip Adams
Vice President Corporate Underwriting
P&C Product Management